{In Archive} RB4 CEIs for the week of September 20th, 2010

Jared Richardson to: Namiraj Jain, Don Tsai, Mazhar Ali, Rosario Aston

09/14/2010 08:58 AM

Cc: "Jared Richardson", "Max Kuker", "Wes Ganter", "Fatima Ty"

Archive: This message is being viewed in an archive.

Namiraj, Mazhar, Don, and Rosario:

PG Environmental, LLC (PG) is planning on inspecting the facilities listed below from September 20 to 23, 2010. If you would like to attend please let me know. We understand if that is not possible and PG will contact you if any major issues or difficulties are encountered in the field. If you are unable to attend, but have some issues or focus areas that you would like PG to address during the inspections, please feel free to let me know. The facility notification process is scheduled to begin today. I will follow up this email with a phone call to the respective case handlers for each of the facilities listed.

If for some reason you need to reach me while I'm in the field this week, please feel free to contact me on my cell phone @ 814.360.7314.

Inspector	Date	Time (PST)	NPDES No.	Type	Order No.	Agency Name	Facility Name	Case Handler
Jared	Mon. 9/20/10	11:30 AM	CAG994003	MINOR	R4-2009-0047	Certified Alloy Products, Inc.	Certified Alloy Products, Inc.	Namiraj Jain
Jared	Tues. 9/21/10	8:30 AM	CA0053856	MAJOR	R4-2010-0071	LA City Bureau of Sanitation	Terminal Island Water Reclamation Plant	Don Tsai
Jared	Wed. 9/22/10	8:30 AM	CA0059285	MINOR	R4-2005-0065	BP West Coast Products LLC	Long Beach Marine Terminal 1, Berth 121	Mazhar Ali
Jared	Thurs. 9/23/10	8:00 AM	CA0059153	MINOR	R4-2007-0031	BP West Coast Products LLC	BP Wilmington Calciner	Rosario Aston

Respectfully,

Jared Richardson, CESSWI
PG Environmental, LLC
607 10th Street, Suite 307
Golden, CO 80401
303-279-1778, ext. 106 (office)
303-279-1793 (fax)
jared.richardson@pgenv.com

visit our website at *www.pgenv.com*

{In Archive} RB4 CEIs for the week of September 20th, 2010

Jared Richardson to: 'Namiraj Jain', 'Don Tsai', 'Mazhar Ali', 'Rosario Aston', Jose Morales

09/14/2010 09:36 AM

Cc: "'Jared Richardson'", "'Max Kuker'", Fatima Ty

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Namiraj, Mazhar, Don, and Rosario:

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Respectfully,

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{In Archive} PG Environmental Regional Water Board 4 CEI Reports (Email 1 of 1)

Max Kuker to: 'Hugh Marley' 12/14/2010 11:32 AM

Cc: "'Wes Ganter'", Ann Murphy, "'Philip Isorena'", documentcontrol, "'Jose Morales'", Fatima Ty, Ken Greenberg, "'Max Kuker'", COwens, NPDES_Wastewater, "'Brandi Outwin'", "'Eugenia. Hargreaves'",

Archive: This message is being viewed in an archive.

Dear Mr. Marley,

PG Environmental, LLC (PG) is delivering draft NPDES compliance evaluation inspection reports for the facilities shown in the following table.

Agency Name

Facility Name

CI No.

Permit No.

Order No.

Inspection Date

Facility Rating

Comments

Certified Alloy Products, Inc.

Long Beach

CI-6734

CAG994003

R4-2009-0047

09-20-2010

Rating 2 - Medium Priority Follow-up

Many findings were identified as a result of the inspection; however, the Discharger ceased discharges of process water in response to effluent limitation violations. An industrial storm water inspection is recommended.

BP West Coast Products LLC -

BP Carson Refinery

CI-5424

CA0000680

R4-2007-0015

9-29-2010

Rating 2 - Medium Priority Follow-up

No discharges regulated under order; however, sampling issues were noted in regards to storm water discharges. An industrial storm water inspection is recommended.

PG will be providing two sets of the hardcopy reports, including photo log and exhibit log (if necessary) for each facility. Please contact me directly at 703-707-8258 Ext. 101 with questions and comments regarding these inspection reports or photo logs. The enclosed inspection reports and photo logs are drafts and subject to revision at the Water Board's request.

Thanks,

Max Kuker

Max Kuker

PG Environmental, LLC

570 Herndon Parkway

Suite 500

Herndon, VA 20170

Phone: 703-707-8258 (x101)

Fax: 703-707-8259

<mailto:max.kuker@pgenv.com> max.kuker@pgenv.com

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RB4 - cover letter - 12-14-10.pdf

RB4 - cover letter - 12-14-10.docx

CA0000680 - CI-5424 - BP West Coast Products LLC - BP Carson Refinery - 9-29-2010.pdf

CAG994003 - CI-6734 - Certified Alloy Products Inc - 09-20-2010.pdf

EPA Region IX and California Water Resources Control Board

NPDES Compliance Evaluation Inspection (CEI) Report

Name and Location of Facility Inspected			**Entry Date**	**Permit Effective Date**
Certified Alloy Products, Inc. (CI - 6734) 3245 Cherry Avenue P.O. Box 90 Long Beach, CA 90801			9/20/2010 **Entry Time** 11:30 AM	6/25/2010
NPDES Permit Number	**Order Number**	☐ **Major** ☒ **Minor**		**Permit Expiration Date**
CAG994003	R4-2009-0047			4/30/2014
Name(s) & Title(s) of On-Site Representative(s)		**Contact Information**		**Notified of Inspection?**
Ralph Druyor (EHS Manager) Joseph Huang (V.P. of Manufacturing)		Phone: (562) 595-6621 ext. 227 Fax: (562) 989-0143 E-mail: rdruyor@doncasters.com		☒ **Yes** ☐ **No**
Name, Title & Address of Responsible Official		**Contact Information**		**Official Contacted?**
Joseph Huang (V.P. of Manufacturing) 3245 Cherry Avenue, P.O. Box 90 Long Beach, CA 90801		Phone: (562) 595-6621 ext. 224 Fax: (562) 595-0143 E-mail: jhuang@doncasters.com		☒ **Yes** ☐ **No**
Inspector(s) **Primary:** Jared Richardson (PG Environmental, LLC) **Other(s):**				**Presented Credentials?** ☒ **Yes** ☐ **No**
Weather Conditions at the Time of the Inspection:		**Facility Receiving Water Name:**		
Sunny; no recent precipitation		Los Cerritos Channel		

Overview of Areas Evaluated During Inspection

S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated

Permit: S	Flow Measurement: U	Biosolids/Solid Waste Handling & Disposal: N
Records/Reports: U	Self-Monitoring Program: U	Compliance Schedules: N
Facility Site Review: U	Laboratory: U	Pretreatment (POTWs Only): N
Effluent and Receiving Waters: U	Operations & Maintenance: S	Storm Water: U

Prepared By: Jared Richardson (PG Environmental, LLC) on 9/27/2010

Reviewed By: Craig Chomiak (PG Environmental, LLC) on 10/12/2010

Facility Narrative

On September 20, 2010 a USEPA contractor inspected Certified Alloy Products, Inc. in Long Beach, California. Discharges from the Facility are regulated by Regional Water Board Order No. R4-2009-0047 (NPDES Permit No. CAG994003). The primary purpose of the inspection was to determine the accuracy and reliability of the Discharger's self-monitoring and reporting program. The primary on-site Facility representative was Ralph Druyor (Environmental Health and Safety Manager). The weather at the time of inspection was sunny with no recent precipitation.

Certified Alloy Products, Inc. (Discharger) owns and operates a high-performance vacuum-refined alloy facility (Facility) in Long Beach. The Facility produces alloys for use in aerospace and industrial gas turbine engines and other commercial and industrial applications. The Facility utilizes four vacuum induction furnaces which melts metal at approximately 3,000 degrees Fahrenheit. Open loop metal jackets around the furnaces and non-contact cooling water (NCCW) are used to maintain adequate operating temperatures in the furnaces and ancillary equipment. Six Baltimore air coil heat exchangers / cooling towers are utilized by the Facility to cool the recirculated NCCW. The Facility uses chemical additives for corrosion inhibition and algal control of the NCCW as detailed in the 'Facility Site Review' section of this report.

The Facility is authorized to discharge up to 8,000 gallons per day (gpd) of NCCW. The NCCW is discharged from the Facility into a storm drain at Discharge Point 1 located at the southeast corner of the Facility adjacent to Cherry Avenue, which subsequently flows into the Los Cerritos Channel. Discharges typically range from 400 to 2,000 gpd based on productivity; however, as of August 27, 2010, the Facility had ceased all discharges of NCCW to Discharge Point 1 as a result of a settlement offer issued by the Los Angeles Regional Water Quality Control Board (Regional Water Board) on August 3, 2010. Since August 27, 2010, all NCCW has been directed to a 20,000 gallon portable Baker Tank for temporary storage and hauled off site approximately twice per week to the Crosby and Overton Treatment, Storage, and Disposal (TSD) facility located in Long Beach. The portable Baker Tank contained 4,500 gallons of NCCW at the time of the inspection. The Facility is currently in the process of obtaining a Sewer Use Permit from the City of Los Angeles Bureau of Sanitation for discharge of the NCCW into the sanitary sewer system.

Effluent samples for Discharge Point 1 are collected as grab samples from a sample port (Monitoring Location M-001) (refer to Photo 12), prior to contact with the receiving water and/or dilution by any other water or waste (e.g., storm water), at the southeast corner of the Facility adjacent to Cherry Avenue, which subsequently flows into the Los Cerritos Channel. The sample collection location and methods appeared to provide representative samples.

Self monitoring reports (SMRs) for the period of October 2009 through June 2010 were reviewed as a component of this inspection. The review included a comparison of reported monitoring results versus requirements and limitations contained within the permit. Permit limit exceedances were identified and are presented in the 'Major Findings – Effluent and Receiving Waters' section of this report. The evaluation also included a comparison of data points reported in the SMRs submitted to the Regional Water Board against the bench sheets and contract laboratory reports documenting the actual analytical results. Discrepancies were identified and are presented in the 'Major Findings – Records/Reports' section of this report.

Major Findings

Records/Reports

1. Regional Water Board Order No. R4-2009-0047, Attachment D – Federal Standard Provisions, Section IV.B requires that the Discharger's records of monitoring information include "The date, *exact place [emphasis added]*, and time of sampling or measurements". The chain-of-custody for a May 19, 2010 sampling event did not contain the exact place of sampling. Specifically, the chain-of-custody's sample ID/location field only indicated the type of sample ("Grab"), not the specific location of sample collection (i.e., Discharge Point 1 or Monitoring Location M-001) (refer to Exhibit 1). No additional sampling documentation was provided indicating the location of the sampling.

2. Regional Water Board Order No. R4-2009-0047, Attachment D – Federal Standard Provisions, Section V.H states that "The Discharger shall report all instances of noncompliance not reported under Standard Provisions – Reporting, Section V.E at the time monitoring reports are submitted". In addition, Regional Water Board Order No. R4-2009-0047, Attachment E – Monitoring and Reporting Program, Section IX.A.3 states that "Each monitoring report shall contain a separate section titled *Summary of Non-Compliance* which discusses the compliance record and corrective actions planned that may be needed to bring the discharge into full compliance with waste discharge requirements. This section shall clearly list all non-compliance with waste discharge requirements, as well as all excursions of effluent limitations".

   The Discharger did not summarize all instances of non-compliance in a *Summary of Non-Compliance* section on the quarterly SMR submittals to the Regional Water Board for the Fourth Quarter of 2009 (October through December 2009) and the Second Quarter of 2010 (April through June 2010). Further, the quarterly SMRs did not contain the required "Summary of Non-Compliance" section containing a discussion of the non compliance and corrective actions planned to bring the discharge into full compliance.

   The Facility Operations Manager certified, in the cover letters of both reports, that "the facility is in full compliance with the permit requirements" (refer to Exhibit 3); however, upon review of the documentation provided with the quarterly reports, it was noted that the Discharger exceeded the effluent limitation for settleable solids on November 19, 2009 (Fourth Quarter 2009). Refer to the 'Major Findings – Effluent and Receiving Waters' Section of this report, Finding No. 1 for additional details regarding excursions of the settleable solids and pH effluent limitations.

3. Regional Water Board Order No. R4-2009-0047, Attachment E – Monitoring and Reporting Program, Section IX.B.5.a states that "The Discharger shall arrange all reported data in a tabular format. The data shall be summarized to clearly illustrate whether the facility is operating in compliance with interim and/or final effluent limitations." The Discharger's SMRs reviewed as a component of this inspection did not arrange reported data in a tabular format.

Facility Site Review

1. Regional Water Board Order No. R4-2009-0047, Standard Provisions, Section VII.A.b.iv requires that "Oil or oily materials, chemicals, refuse, or other materials that my cause pollution in storm water and/or urban runoff shall not be stored or deposited in areas where they may be picked up by rainfall/urban runoff and discharged to surface waters". The Discharger did not provide adequate secondary containment for the partially covered hazardous waste storage

area (refer to Photo 3) located at the southwest corner of the Facility. Specifically, an open drain was noted in the secondary containment berm was observed in the open position (refer to Photos 4 and 5). As a result, there was a potential for the contribution of pollutants to storm water runoff from the hazardous waste storage area and subsequent discharge to the adjacent storm water conveyance channel (refer to Photos 3 and 5). The conveyance channel runs along the southern portion of the Facility and discharges to the local MS4 (as stated by the Facility representative) and ultimately into the Los Cerritos Channel. An observation of the discharge point did not indicate any evidence of pollutants. It should be noted that the hazardous waste storage area was actively being utilized at the time of the inspection. The storage of used oil, aerosols, oily rags, etc. was also observed (refer to Photo 6).

Effluent and Receiving Waters

1. Regional Water Board Order No. R4-2009-0047, Section V – Effluent Limitations and Discharge Specifications, Item V.A, prohibits the discharge of pollutants in excess of limitations provided in Table 1 – General Constituents. As a component of this inspection, a comparison of data points reported in the SMRs submitted to the Regional Water Board against the laboratory analytical results, chain-of custodies, and raw data sheets documenting the actual analytical results from October 2009 through June 2010. During this comparison, it was noted that a settleable solids daily maximum exceedance (November 19, 2009 – reported 4.7 ml/L; limit 0.3 ml/L) was identified for Discharge Point 1 (refer to Exhibit 3). It should be noted that the Discharger's SMR included the analytical results; however, the Discharger did not indicate the settleable solids constituent as an instance of non-compliance, but rather stated that the "Facility is in full compliance with permit requirements" (refer to Exhibit 3).

   The Discharger has also reported additional effluent exceedances for residual chlorine, copper, lead, and zinc between April 2006 and May 2010. These exceedances were documented in the in the Regional Water Board Settlement Offer No. R4-2010-0141-M. An explanation of the exceedances is provided in the Discharger's response to the settlement offer (refer to Exhibit 2) and was reviewed as a component of this inspection.

Flow Measurement

1. Regional Water Board Order No. R4-2009-0047, Attachment E – Monitoring and Reporting Program, Section I.M states that "The Discharger shall calibrate and perform maintenance procedures on all monitoring instruments and to ensure accuracy of measurements, or shall insure that both equipment activities will be conducted". In addition, Regional Water Board Order No. R4-2009-0047, Attachment D – Federal Standard Provisions, Section IV.A requires that "The Discharger shall retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings or continuous monitoring instrumentation, copies of all reports required by this Order, and records of all data used to complete the application for this Order, for a period of at least three (3) years". The Facility representative stated that they did not maintain calibration records nor was he aware of calibrations being conducted for the effluent flow meter.

Self-Monitoring Program

1. Regional Water Board Order No. R4-2009-0047, Attachment E – Monitoring and Reporting Program, Section III.A – Table 2. Effluent Monitoring requires the Discharger to monitor Methylene Blue Active Substances (MBAS) on a quarterly frequency from Discharge Point 1. Based upon the review of the Second Quarter 2010 SMR, laboratory analytical results, and

chain-of-custodies, the analysis for MBAS was not conducted during the Second Quarter of 2010. Further. the Facility representative did not appear to be aware of this monitoring requirement and it is expected that the sampling and analysis for MBAS was not conducted in other quarters but a review of documentation for other quarters was not conducted for this parameter.

2. Regional Water Board Order No. R4-2009-0047, Attachment E – Monitoring and Reporting Program, Section I.P states that "For parameters that both monthly average and daily maximum limitations are specified and the monitoring frequency is less than four times a month, the following shall apply. If an analytical result is greater than the monthly average limitation, the Discharger shall collect four additional samples at approximately equal intervals during the month, until compliance with the monthly average limitation has been demonstrated. All five analytical results shall be reported in the monitoring period for that month, or 45 days after results for the additional samples were received, whichever is later."

   The Discharger exceeded the settleable solids daily maximum exceedance on November 19, 2009 (refer to 'Major Findings – Effluent and Receiving Waters' section above). The sample was the only settleable solids sample collected and analyzed by the Discharger in November 2009 resulting in the sample representing the monthly average as the Discharger did not conduct additional monitoring and reporting during the month of November.

Laboratory

1. Regional Water Board Order No. R4-2009-0047, Attachment D – Federal Standard Provisions, Section III.B requires that monitoring results must be conducted according to test procedures under 40 CFR Part 136. In addition, Attachment E – Monitoring and Reporting Program, Section III, Table 2 – Effluent Monitoring requires quarterly monitoring of "residual chlorine". The Discharger's contract laboratory incorrectly analyzed a sample from Discharge Point 1 for total chlorine (Method 4500-CL G) rather than the required residual chlorine (Method 4500-CL D) on May 13, 2009. It should be noted, that the Discharger also used the incorrect analytical method for residual chlorine for the following sampling events: September 12, 2007, February 1, 2008, May 7, 2008, and August 12, 2008 (refer to Exhibit 4, Page 1 of 4) identified in Regional Water Board Settlement Offer No. R4-2010-0141-M.

   In response to the settlement offer, the Discharger acknowledged the incorrect analyses (refer to Exhibit 4, Pages 1 and 2) and stated that "The chain-of-custody form submitted with each set of samples clearly identifies residual chlorine as the analyte of interest" (refer to Exhibit 4, Page 2). However, based upon review of the Discharger's contract laboratory analytical results and chain-of-custody forms, the inspector determined that both the contract laboratory analytical results and chain-of-custody form for the May 13, 2009 sampling event indicated the incorrect analytical method for residual chlorine as Method 4500-CL G (refer to Exhibit 4, Pages 3 and 4).

2. Regional Water Board Order No. R4-2009-0047, Attachment E – Monitoring and Reporting Program, Section IV.B.1 requires the Discharger to conduct acute toxicity tests on effluent grab samples in accordance with 40 CFR 136 which cites USEPA's *Methods for Measuring the Acute Toxicity of Effluents and Receiving Waters to Freshwater and Marine Organisms*, Fifth Edition, October 2002 (EPA/821-R-02-012). The Discharger's acute toxicity testing for the February 12, 2007 and the May 19, 2010 grab sample from Discharge Point 1 was analyzed using the USEPA's *Methods for Measuring the Acute Toxicity of Effluents to Freshwater and Marine Organisms* (EPA/600/4-85-013) (refer to Exhibit 5), which is not an approved method in

accordance with 40 CFR Part 136, Table IA – List of Approved Biological Methods for Wastewater and Sewage Sludge.

3. Regional Water Board Order No. R4-2009-0047, Attachment E – Monitoring and Reporting, Section I.K states that "Water/wastewater samples must be analyzed within allowable holding time limits as specified in 40 CFR Part 136.3". 40 CFR Part 136, Table II, requires pH and total residual chlorine analysis to be conducted within fifteen minutes of sample collection. The Discharger's lack of pH and total residual chlorine monitoring documentation for December 2009 and May 2010 for Discharge Point 1 could not demonstrate the sample time and time of analyses to confirm that pH and total residual chlorine were analyzed within fifteen minutes of sample collection (refer to Exhibit 4, Page 3 of 4). As a result, it was unclear that the Discharger was meeting the allowable holding time for pH and total residual chlorine analysis as required by the permit.

Storm Water

1. Regional Water Board Order No. R4-2009-0047, Standard Provisions, Section VII.A.b.iv requires that "Oil or oily materials, chemicals, refuse, or other materials that may cause pollution in storm water and/or urban runoff shall not be stored or deposited in areas where they may be picked up by rainfall/urban runoff and discharged to surface waters". The Discharger did not provide adequate coverage or secondary containment for two 55-gallon drums of used oil stored adjacent to the hazardous waste storage area (refer to Photo 9) located at the southwest corner of the Facility. Specifically, two partially full 55-gallon drums were stored outside of the adjacent partially covered secondary containment storage area without bungs properly in place. As a result, there was a potential for the contribution of pollutants to storm water runoff from the two - 55-gallon drums of oil and subsequent discharge to the downgradient storm water conveyance channel which flows off site ultimately into the Los Cerritos Channel (refer to Photos 3 and 5).

Attachments:
CEI Photo Log
CEI Exhibit Log

PERMIT: **OVERALL RATING: S**

INSPECTED ITEM	EVAL
1. Current copy of Facility's NPDES permit available on site.	S
2. Correct name and mailing address of permittee identified on NPDES permit.	S
3. Facility is as described in permit.	S
4. a. Notification given to Regional Water Board of process/production modifications, collection system expansions, etc. that impacted quality/quantity of discharge or changes to the Facility or increased discharge. b. Permit modification received, if required, prior to changes.	N N
5. Recent permit modifications, amendments or compliance orders on file.	S
6. Number of discharge outfalls the same as listed in the permit.	S
7. Name of receiving waters listed correctly in the permit.	S
8. Permit status (i.e., Current, Expired, or Extended)	Current
9. Permit renewal application submitted to the Regional Water Board at least 180 days prior to the expiration date.	N
10. Other:	N

Notes:

This section was rated "satisfactory" because all checklist items reviewed were rated satisfactory.

RECORDS/REPORTS: **OVERALL RATING: U**

INSPECTED ITEM	EVAL
1. NPDES records maintained for the time period required (5 years): The following records and reports were requested and observed: ***- Current permit, monitoring and reporting program, and standard provisions*** ***- Latest SMRs (October 2009 through June 2010)*** ***- Equipment calibration logs*** ***- Spill Prevention Control and Countermeasure (SPCC) Plan*** ***- Spill and bypass records*** ***- Flow meter calibration records (not available)*** ***- Contract laboratory records and chain-of-custodies***	Yes
2. a. Did the Facility document any spills or bypasses during the period reviewed?	No
b. Spills and bypasses reported and documented as required by the permit (i.e., as soon as possible, but no later than 24 hours from the time the permittee first became aware of the circumstances).	N
c. Follow-up written documentation given as required by the permit (within 5 days in most cases).	N
3. Discharge monitoring report (DMR) and/or self monitoring report (SMR) evaluation:	
a. The responsible person or designee signs and certifies the DMRs and/or SMRs.	S
b. The Facility monitors more frequently than required by the permit.	No
c. All data collected are summarized on the DMRs and/or SMRs.	S
d. Data reported on DMRs and/or SMRs is consistent w/ analytical results.	S
e. Coliform concentrations calculated as required by the permit (e.g., median, geometric mean).	N
f. Numerical values for minimum detection limits are reported on DMRs and/or SMRs when laboratory reports “Not Detected” or “0” (for example, MDL= 3, Report: “<3” on DMR).	S
g. “Less than values” properly carried through loading calculations.	N
h. Flow measurement period used for loading calculations brackets the sampling period.	N
i. Influent and/or effluent loading rates properly calculated; if required.	N
j. Number Exceeding (N.E.) properly reported on all DMRs and annual reports.	U
SMRs, not DMRs, were reviewed as a component of this inspection. ***3j. The Discharger has had numerous residual chlorine, pH, copper, zinc, and lead exceedences for 2007 through 2010; however, these exceedences were not properly reported on the SMRs. This checklist item was accounted for in the ‘Effluent and Receiving Waters’ section of this report.***	

RECORDS/REPORTS: **OVERALL RATING: U**

INSPECTED ITEM	EVAL
4. Reports completed in the time frame and frequency as required by the permit (not all reports required for all facilities):	
a. DMRs and/or SMRs	S
b. Biosolids Monitoring Reports	N
c. Biosolids Management Reports	N
d. CSO/ I&I Reports	N
e. Compliance Schedule Reports	N
f. Pretreatment Reports	N
g. Other:	N
5. Sampling and analytical records (for water and biosolids) include:	
a. Dates, times, and location of sampling	U
b. Names of individuals performing sampling	S
c. Analytical methods	U
d. Results of analyses	S
e. Dates of analyses	S
f. Time of analyses, as necessary to verify holding times	U
g. Analysts' names or initials	S
h. Instantaneous flow at grab sample stations, if required	N
5a. The exact location of the sampling was not clearly indicated on the chain-of-custody for the May 19, 2010 sampling event. Refer to the 'Major Findings - Records/Reports' section of this report for additional details.	
5c. The Discharger did not conduct analysis of residual chlorine and acute toxicity as required by the permit for discharges from Discharge Point 1. This checklist item is accounted for in the 'Laboratory' section of this report.	
5f. The Discharger's lack of pH and total residual chlorine monitoring documentation for December 2009 and May 2010 for Discharge Point 1 could not demonstrate the sample time and time of analyses to confirm that pH and total residual chlorine were analyzed within fifteen minutes of sample collection. This checklist item is accounted for in the 'Laboratory' section of this report.	
6. Plant records include:	
a. Daily plant operational records or log book	N
b. Equipment maintenance records and schedules	N
c. CSO/lift station check records or log book	N
d. Records of auxiliary power checks	N
e. Spill Prevention Control and Countermeasure (SPCC) plan	N
f. Pollution Prevention Plan (P3)	N
g. Storm Water Pollution Prevention Plan (SWPPP)	N
h. Influent and/or effluent flow measurement records maintained for the past three years	S
i. Other:	N

RECORDS/REPORTS: **OVERALL RATING: U**

INSPECTED ITEM	EVAL
7. All records and reports required by the permit appear to be organized and available for inspection. ***The Discharger's records and reports required by the permit where not adequately organized or readily available. For example, the Discharger did not maintain flow meter calibration records as indicated in checklist item 1. In addition, the data reported on the SMRs reviewed as a component of this inspection were not arranged in a tabular format as required by the monitoring and reporting program. Refer to the 'Major Findings – Records and Reports' section of this report for additional details.***	U
8. Other:	N

Notes:

This section was rated "unsatisfactory" due to checklist items 5a., 5c, and 7. Checklist items 3j. and 5f. are accounted for in the 'Effluent and Receiving Waters' and 'Laboratory' sections of this report, respectively.

FACILITY SITE REVIEW: **OVERALL RATING: U**

INSPECTED ITEM	EVAL
1. All treatment units and supporting equipment are in service and mechanically functioning properly. ***The Facility provides chemical addition to its NCCW to prevent corrosion and algae growth. The Discharger utilizes an outside contractor (Skasol) to provide water treatment solutions for the Facility's NCCW and cooling towers. Skasol adjusts the chemical feed rates and quantities of corrosion inhibitors, biocide, and micorbiocide in the NCCW every two weeks at the Facility. It should be noted that the permit does not have any requirements regarding the frequency or quantity of chemical addition/treatment.***	S
2. Hydraulic and organic loadings are consistent with the fact sheet and plant design criteria. a. Are there signs of overloading to the Facility and collection system, including I&I and septage loading?	N N
3. Peak flows remain within the established plant capacity. a. If flows have exceeded capacity, has the Regional Water Board been notified?	S N
4. Lift stations are properly monitored, maintained, have a back-up power source and are not subject to chronic spills and/or overflows.	N
5. Odors are adequately controlled, resulting in limited complaints.	S
6. Residual chlorine monitoring is well documented and sampling/monitoring is representative of the discharge. a. If a UV system is used, the dosage intensity, tubes, and alarms are adequate, maintained and documented. ***The Discharger's lack of total residual chlorine monitoring documentation for December 2009 and May 2010 for Discharge Point 1 could not demonstrate the sample time and time of analyses to confirm that total residual chlorine were analyzed within fifteen minutes of sample collection. This checklist item is accounted for in the 'Laboratory' section of this report.***	U N
7. Housekeeping procedures are adequate to prevent release of pollutants to the environment: a. Adequate dikes and secondary containment b. Spill containment and clean-up c. Signs of spillage to soil, groundwater, or surface water d. Storm water and leachate management from storage piles e. Leaking pipes, pumps, etc. f. Drum and chemical storage areas g. Minimization of pollutants entering storm water outfalls h. Other open dumps or debris piles i. Other: ***7a. and 7f. The Discharger did not provide adequate dikes and secondary containment for the hazardous waste storage area. Refer to the 'Major Findings - Facility Site Review' section of this report for additional details.***	 U S S S S U S N N

FACILITY SITE REVIEW: **OVERALL RATING: U**

INSPECTED ITEM	EVAL
8. Signs of tank deterioration and/or settlement.	S
9. Safety concerns are present that may interfere with proper operation, maintenance, and/or monitoring.	S
10. Material Safety Data Sheets (MSDS) are available for stored chemicals.	N
11. Equipment available for spill clean-up and containment.	S
12. Other:	N
Notes: ***This section was rated "unsatisfactory" due to checklist items 7a. and 7f.***	

EFFLUENT AND RECEIVING WATERS: **OVERALL RATING: U**

INSPECTED ITEM	EVAL
1. Recent DMR and/or SMR history (last ***9*** months) (outfall number(s) ***001***):	
a. Violations of discharge limits	U
b. Spills/bypasses	S
c. Fish kills or other receiving water impacts	S
d. WET testing results are in accordance with the permit	U
e. If effluent limit violations have been identified, what actions has the Facility taken to eliminate or reduce their recurrence?	S
1a. The Discharger has had numerous residual chlorine, pH, copper, zinc, and lead exceedances for 2007 through 2010, including a settleable solids effluent exceedance on November 19, 2009. Refer to the 'Major Findings - Effluent and Receiving Waters' section of this report for additional details.	
1d. The Discharger did not conduct analysis of residual chlorine and acute toxicity as required by the permit. This checklist item was accounted for in the 'Laboratory' section of this report.	
1e. The Discharger's corrective action taken in response to the numerous effluent exceedances and settlement offer (issued on December 2, 2008 and August 3, 2010) by the Regional Water Board was to install a temporary system to collect and store the NCCW discharges for off site treatment (refer to Exhibit 2, Page 4 of 4, Section 5.0) and the 'Facility Narrative' section of this report for additional details.	
2. DMR and/or SMR spot check conducted for the Months of: ***4th Quarter 2009 (October through December 2009) and 2nd Quarter 2010 (April through June 2010)***	
a. Internal lab sheets and contract lab results properly transferred to DMRs	N
b. Monthly average, weekly, maximum, etc., values correctly calculated per the permit	S
c. Influent and effluent loadings reported	N
d. DMR and/or SMR is accurate and complete for each outfall	U
SMRs, not DMRs, were reviewed as a component of this inspection.	
2d. The Discharger is not conducting all monitoring as required by the permit. Specifically, the Discharger does not appear to be monitoring MBAS on a quarterly frequency, and was not conducting additional monitoring as required by the permit for a settleable solids exceedance. Refer to the 'Major Findings - Self-Monitoring Program' section of this report for additional details.	
3. Appearance of effluent during inspection:	
a. The effluent(s) was viewed during the inspection	Yes
b. Excessive foam, scum, or sheens present	S
c. Cloudy and/or color	S
d. Excessive solids	S
e. Other:	N
Effluent was viewed at the base of the Z-F cooling tower located adjacent to Building No. 11 (refer to Photo 7).	

EFFLUENT AND RECEIVING WATERS: **OVERALL RATING: U**

INSPECTED ITEM	EVAL
4. Appearance of receiving water(s) during inspection:	
a. The receiving water(s) was viewed during the inspection	No
b. Distinctly visible foam or sheens on receiving water	N
c. Biosolids accumulation or deposits of solids below discharge point(s)	N
d. Distinctly visible plume from discharge(s) to receiving water	N
e. Discharge creates objectionable odor at or near receiving water(s)	N
f. Other:	N
The receiving water was not viewed because, as of August 27, 2010, the Facility no longer discharges to the storm drain at Discharge Point 1 (refer to the 'Facility Narrative' section of this report for additional details). It was confirmed during the Facility site review that the discharge lines for NCCW had been disconnected (refer to Photos 12 and 13).	
5. Other:	N

Notes:

This section was rated "unsatisfactory" due to checklist item 1a. Checklist items 1d. and 2d. were accounted for in the 'Laboratory' and 'Self-Monitoring Program' sections of this report, respectively.

FLOW MEASUREMENT: **OVERALL RATING: U**

INSPECTED ITEM	EVAL
1. Flow Measurement devices and methods:	
Influent Measurement:	
Primary Device: *N/A*	N
Secondary Device: *N/A*	N
Effluent Measurement:	
Primary Device: *Flow totalizer*	S
Secondary Device: *N/A*	N
Other method of estimating flow: *N/A*	N
2. Flow measurement devices designed to meet permit requirements ("continuous measured," "continuous record," etc.).	S
3. Flow measurement location is representative of the actual discharge (considering return and bypass lines, etc.).	S
4. Flumes:	
a. Approach channel straight for at least 10 times the maximum head height in flume	N
b. Flow enters flume evenly distributed across the channel and free of turbulence, boils, or other disturbances	N
c. The flume is clean and free of debris or deposits	N
d. All flume dimensions appear accurate, level, and plumb	N
e. Flume head is being measured properly	N
f. Flume is appropriately sized to measure the existing range of flows	N
g. No obstructions downstream causing inaccurate flow measurement due to excessive "submergence" in flume	N
h. Proper flow tables being used	N
5. Weirs:	
a. Approach channel straight for at least 10 times the maximum head height	N
b. Flow in the approach channel is evenly distributed and free of turbulence, boils, or other disturbances	N
c. No solids accumulation in the bottom of the approach channel	N
d. Weir crest is located at least two times the maximum head height off the floor of the flow channel	N
e. The weir plate is level, plumb and without distortions	N
f. Weir is beveled on downstream side if plate is >1/8 inch thick	N
g. No leakage around the weir plate	N
h. Measuring point located at least 3 times the maximum head height behind (upstream of) the weir	N
i. There is free-fall and access for air below the nappe of the weir (i.e., water doesn't cling to the weir plate)	N
j. Weir sized properly to measure the existing range of flows	N
k. Proper flow tables being used for weir type and size	N

FLOW MEASUREMENT: **OVERALL RATING: U**

INSPECTED ITEM	EVAL
6. Secondary flow device properly installed and maintained, and operating without interference from foam, turbulence, webs, etc.	N
7. Date of last flow meter calibrations: **Influent**: / / Performed by: _____ **Effluent**: / / Performed by: _____ ***The Discharger did not maintain calibration records for the flow meter (refer to Photo 8). Refer to the 'Major Findings - Flow Measurement' section of this report for additional details.***	N U
8. Calibration checks by plant personnel routinely performed.	N
9. Calibration records (external and internal checks) maintained. ***This checklist item is accounted for in checklist item 7. above.***	U
10. Other:	N
Notes: ***This section was rated "unsatisfactory" due to checklist items 7. and 9.***	

SELF-MONITORING PROGRAM: **OVERALL RATING: U**

INSPECTED ITEM	EVAL
1. Sampling locations, type, methods, and frequencies conform to the NPDES permit for all required samples (including influent, effluent, biosolids, receiving stream, etc.). ***The Discharger does not appear to be monitoring MBAS on a quarterly frequency, and was not conducting additional monitoring as required by the permit for a settleable solids exceedance. Refer to the 'Major Findings - Self-Monitoring Program' section of this report for additional details.***	U
2. Sampling locations and methods provide representative samples.	
a. Grab samples are collected during peak flow conditions rather than low-stress conditions	S
b. Composite sampling procedures comply with the permit (time vs. flow weighted)	N
c. Other:	N
3. Automatic samplers and other sampling equipment are properly cleaned.	N
4. Samples are preserved using methods listed in 40 CFR, Part 136 (e.g., chilled, acidified).	S
5. Sample containers are as listed in 40 CFR, Part 136.	S
6. Chain-of-custody is maintained and documented.	S
7. Samples are collected using approved protocols:	
a. Coliform samples are collected directly into sterilized containers	N
b. BOD samples are collected prior to disinfection or reseeded	N
c. Oil and grease samples are collected directly into glass containers	N
d. Other:	N
8. Other:	N

Notes:

This section was rated "unsatisfactory" due to checklist item 1.

LABORATORY: **OVERALL RATING: U**

INSPECTED ITEM	EVAL
1. On-site laboratory is ELAP-certified? a. List parameters analyzed at the on-site laboratory that are used for DMR reporting: ***temperature*** b. List additional parameters analyzed for internal monitoring and process control: ***N/A*** ***The Facility is not equipped with an on-site laboratory.***	No
2. EPA-approved analytical methods are used by the on-site laboratory?	S
3. Adequate equipment and procedures used for on-site analyses: a. BOD and CBOD b. TSS c. pH d. Dissolved Oxygen e. Residual Chlorine f. Temperature g. Other:	 N N S N N S N
4. On-site laboratory records include: a. Laboratory SOPs b. Calibration and maintenance of equipment c. Equipment operating instructions and manuals ***4b. The Discharger did not maintain calibration records for the pH meter. Refer to the 'Major Findings - Laboratory' section of this report for additional details.***	 N U S
5. Adequate spare parts and supplies for on-site analyses.	S
6. Results of latest external DMR QA study are available and are acceptable. Date of last report: / / ***The Facility does not participate in the DMR QA program.***	N
7. Satisfactory refrigeration in use.	N
8. Certified contract laboratory(s) being used:	S

LABORATORY: **OVERALL RATING: U**

INSPECTED ITEM	EVAL
Laboratory Name: ***Advanced Technology Laboratories*** Visited? ***No*** Address: ***3275 Walnut Avenue*** ***Signal Hill, CA 90755*** Phone: (***562***) ***989-4045*** Parameters: ***TSS, turbidity, oil and grease, settleable solids, residual chlorine, Cu, Ni, Pb, and Zn*** Laboratory Name: ***Associated Labs*** Visited? ***No*** Address: ***806 North Batavia*** ***Orange, CA 92868*** Phone: (***714***) ***771-6900*** Parameters: ***Toxicity***	
Laboratory Name: ***American Scientific Laboratories, LLC*** Visited? ***No*** Address: ***2520 North San Fernando Road*** ***Los Angeles, CA 90065*** Phone: (***322***) ***223-9700*** Parameters: ***BOD***	
9. EPA-approved analytical procedures are identified on contract lab report. ***The Discharger did not utilize the proper methodology for analysis of residual chlorine and acute toxicity as required by the permit. Refer to the 'Major Findings - Laboratory' section of this report for additional details.***	U
10. Holding times being met by on-site and/or contract laboratory. a. pH measured in situ or within 15 minutes of sample collection. b. Residual chlorine measured in situ or within 15 minutes of sample collection. ***10a. The Discharger's lack of pH and total residual chlorine monitoring documentation for December 2009 and May 2010 for Discharge Point 1 could not demonstrate the sample time and time of analyses to confirm that pH and total residual chlorine were analyzed within fifteen minutes of sample collection. Refer to the 'Major Findings - Laboratory' section of this report for additional details.***	 U N
11. Other:	N
Notes: ***This section was rated "unsatisfactory" due to checklist items 4b., 9., and 10a.***	

OPERATIONS AND MAINTENANCE: **OVERALL RATING: S**

INSPECTED ITEM	EVAL
1. Preliminary treatment units (bar screens, comminuters, grit channels, etc.) properly maintained with wastes properly disposed.	N
2. Adequate oxygen maintained in aerated treatment systems.	N
3. No operational problems caused by hydraulic "short-circuiting" in treatment units.	N
4. Biosolids wasting/return rates adequate to maintain system equilibrium.	N
5. Operation and Maintenance (O&M) Manuals and supporting information organized and maintained for use: a. Plant O&M Manual b. Equipment manuals c. Plant engineering drawings d. Collection system drawings available or in development e. Maintenance records/costs	 N S N N N
6. Routine and preventative maintenance items are scheduled and performed on time.	N
7. The amount of maintenance activities and parts in back-log is acceptable.	N
8. Operational problems contributing to plant upset, excessive odors, effluent violations, etc. ***The Facility representatives stated that effluent exceedances were likely a result of high background concentrations of the constituents in the supply drinking water.***	S
9. Level of operator certification as required by the permit and staffing level as specified in O&M Manual.	N
10. Auxiliary power available as required by the permit and operates the necessary treatment units.	S
11. Alarm systems for power and equipment failure.	S
12. Treatment control procedures are established for emergencies.	S
13. Hydraulic surges are handled without excessive solids wash-out or bypasses.	N
14. Spare pumps and parts readily available.	S
15. Facility appears to be well operated and maintained.	S
16. Other:	N

S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated/Not Applicable

OPERATIONS AND MAINTENANCE: OVERALL RATING: S

INSPECTED ITEM	EVAL
Notes: ***This section was rated "satisfactory" because all checklist items reviewed were rated satisfactory.***	

STORM WATER: **OVERALL RATING: U**

INSPECTED ITEM	EVAL
1. Facility storm water discharges are covered under the Facility's individual NPDES permit or the California General Permit for Storm Water Discharges Associated with Industrial Activity (NOI is available). a. If no, should the Facility have submitted an NOI for coverage under the California General Permit for Storm Water Discharges Associated with Industrial Activity (NPDES CAS000001). ***Facility WDID No. 4191005554. It should be noted that the Facility's NOI was not available at the time of inspection.***	Yes N
2. The Facility had a Storm Water Pollution Prevention Plan (SWPPP) available for on site review. ***A SWPPP was not available for review during the inspection. It should be noted that a SWPPP is not required by the permit; however, it may be required for the general permit noted above in checklist item 1.***	M
3. Pollutant sources (materials and practices) are adequately controlled (inside, undercover). ***The Discharger did not provide adequate cover or secondary containment for two 55-gallon drums of oil. Refer to the 'Major Findings - Storm Water' section of this report for additional details.***	U
4. Appropriate best management practices (BMPs) deployed. ***Refer to checklist item 3. (above) and the 'Major Findings - Storm Water' section of this report for additional details.***	U
5. BMPs are being maintained (e.g., waddles and hay bales are intact).	N
5. Designated outfalls and sampling locations are identified.	N
7. Other:	N
Notes: ***This section was rated "unsatisfactory" due to checklist items 2., 3., and 4.***	

Certified Alloy Products, Inc. (NPDES No. CAG994003) Photo Log
Inspected by: Jared Richardson (PG Environmental, LLC)

Photo 1: Facility entrance sign.

Photo 2: Portable 20,000 gallon Baker Tank utilized by the Facility as an interim storage for NCCW.

Photo 3: View of Facility's hazardous waste storage area. A storm water conveyance channel is located adjacent to the concrete wall behind the hazardous waste storage area.

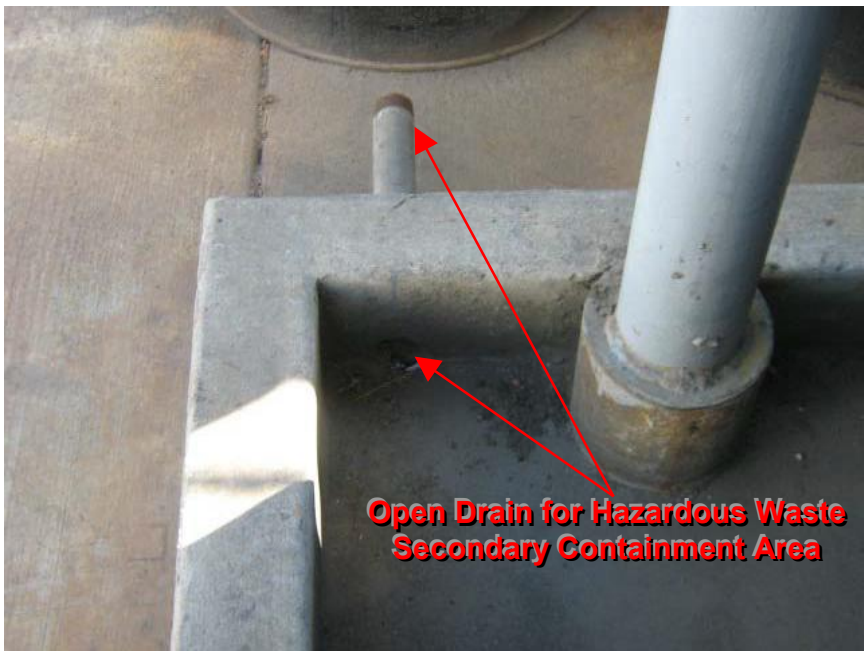


Photo 4: View of open drain for the hazardous waste secondary containment area at the Facility.

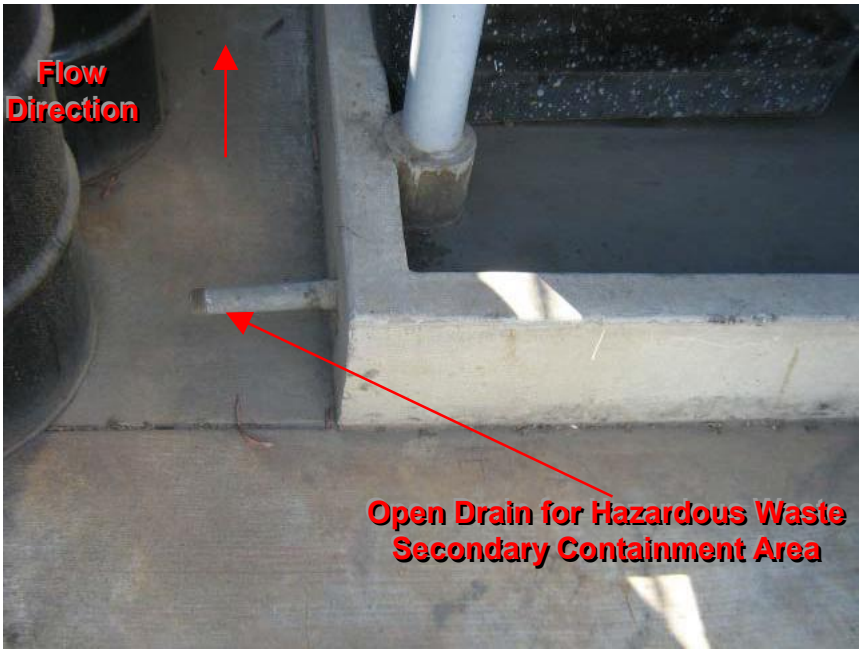


Photo 5: Another view of open drain for the hazardous waste secondary containment area at the Facility. Flow from this drain would be to the south into the storm water conveyance channel identified in Photo 3.

Photo 6: View of used aerosol cans stored in the hazardous waste storage area.

Photo 7: View of non-contact cooling water effluent at the Z-F cooling tower.

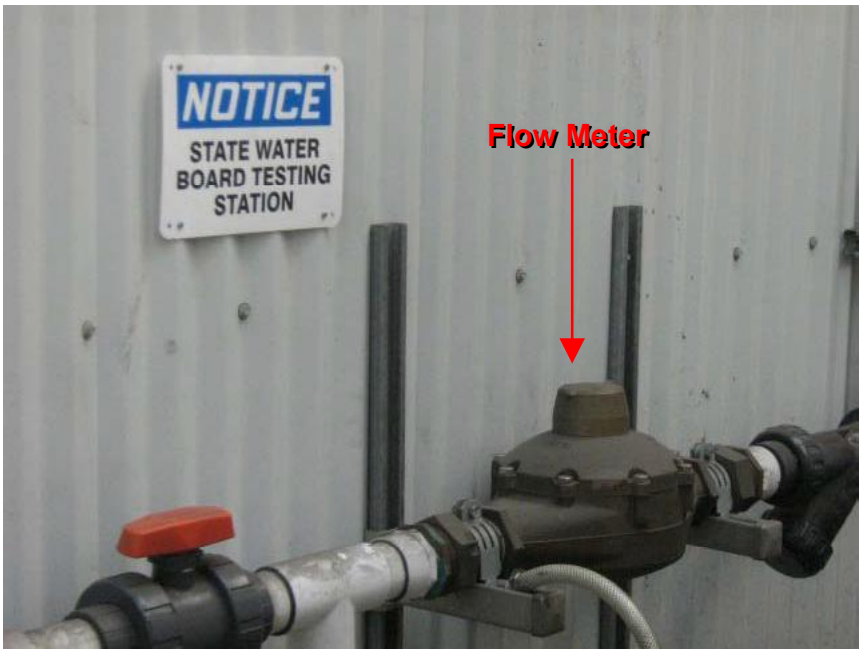


Photo 8: View of flow totalizer meter connected to the sanitary sewer discharge location. Note that the Facility was not actively discharging to the sanitary sewer at the time of the inspection; however, the Discharger had prepared the connection in preparation of receiving approval on the Sewer Use Permit.

Photo 9: View Facility's hazardous waste storage area. Note the two partially full 55-gallon drums of oil stored outside of secondary containment without bungs in place.

Photo 10: Close-up view of the uncovered and uncontained 55-gallon drums of oil. Note that the bungs were not in place for either of the 55-gallon drums of oil.

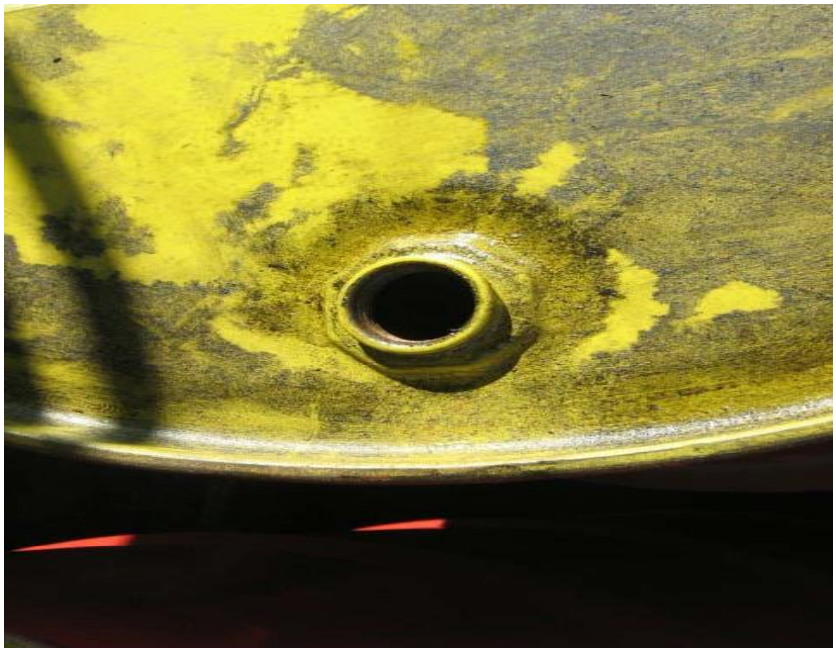


Photo 11: Close-up view of bung not in place for one of the two 55-gallon drums of oil shown in Photos 9 and 10 above.

Photo 12: Monitoring Location M-001. Note that the monitoring location and sample port has been disconnected.

Photo 13: Note that the NCCW discharge line has been disconnected.

Certified Alloy Products, Inc. (NPDES No. CAG994003) Exhibit Log
Inspected by: Jared Richardson (PG Environmental, LLC)

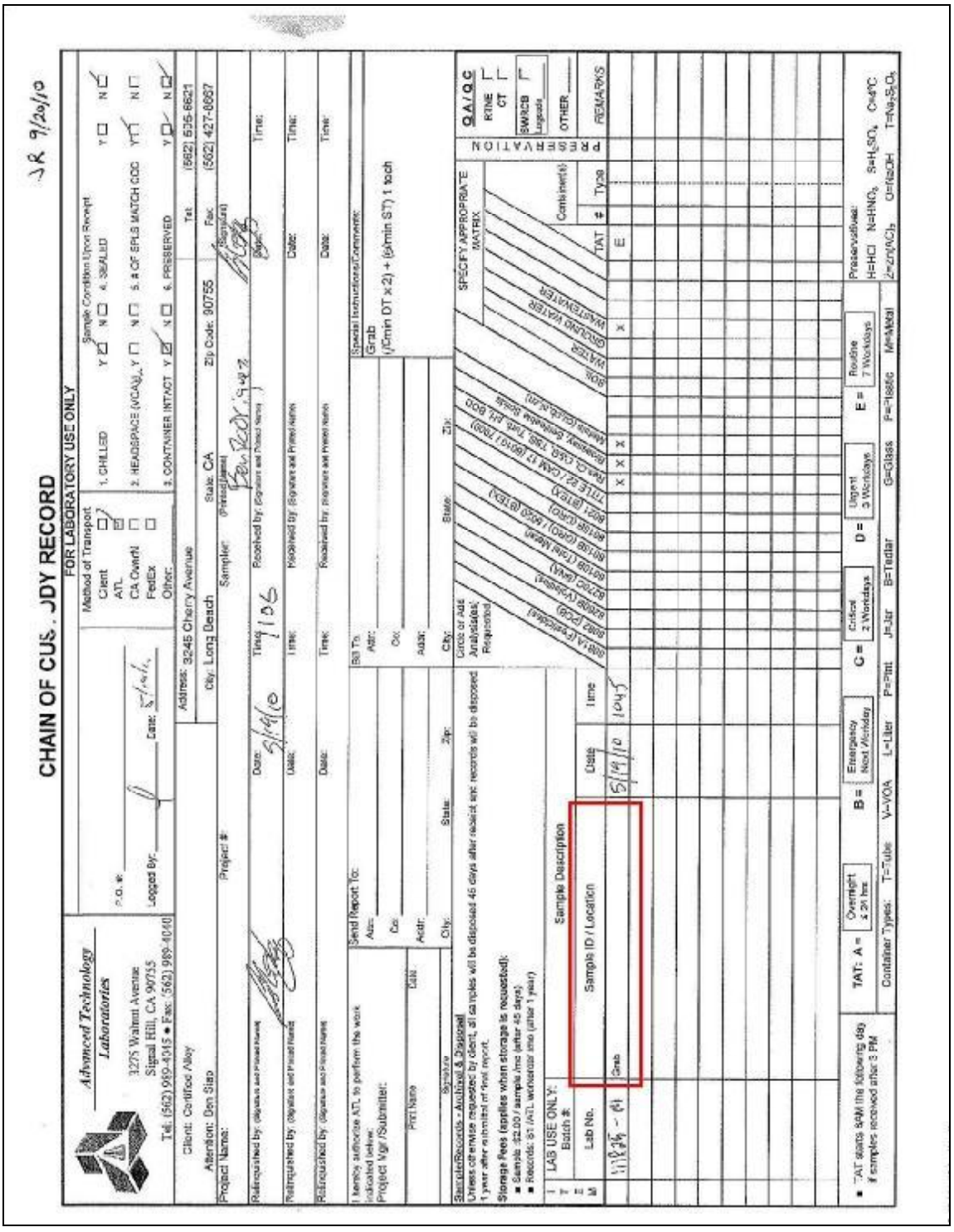


Exhibit 1: The chain-of-custody for May 19, 2010 sampling event did not contain the exact sampling location as required by the permit.

JR 9/20/10

Certified Alloy Products, Inc.
3245 Cherry Avenue, Long Beach, California

P.O. Box 90, Long Beach, CA 90801 • (562) 599-6521 • FAX (562) 427-8667

September 1, 2010

Mr. Chris Lopez
Enforcement Unit
Expedited Payment Program
Los Angeles Regional Water Quality Control Board
320 West 4th Street, Suite 200
Los Angeles, California 90013

RE: RWQCB Settlement Offer No. R4-2010-0141-M: Offer to Participate in Expedited Payment Program Relating To Violations of the NPDES Permit for Certified Alloy Products, Inc., 3245 Cherry Avenue, Long Beach, CA

Order No. R4-2004-0058, NPDES Permit No. CAG994003, CI No. 674

Dear Mr. Lopez:

This letter was prepared and submitted on behalf of Certified Alloy Products, Inc. ("CAPI") in connection with the above-referenced notice of alleged violations identified by the State Water Resources Control Board's water quality data system ("the Notice"). The Notice provides an opportunity to participate in the Expedited Payment Program for Effluent and/or Reporting Violations. CAPI requests participation in the Expedited Payment Program, and as provided for in the program, this response is submitted to contest certain alleged violations as discussed in the following Sections.

1.0 Residual Chlorine Citations

CAPI contests, and respectfully requests, that the Regional Water Quality Control Board ("Board") dismiss and expunge the four alleged residual chlorine violations. The Board, in issuing the citations, relied on erroneous sample data due to incorrect analytical methods employed by the laboratory. These erroneous sample data are summarized below:

Date	Monitoring Period	Violation Type	Parameter	Reported Value	Permit Limit	Units	Penalty
09/12/07	3rd Quarter 2007	Daily Max	Chlorine	0.23	0.1	µg/L	$3,000
02/01/08	1st Quarter 2008	Daily Max	Chlorine	0.7	0.1	µg/L	$3,000
05/07/08	2nd Quarter 2008	Daily Max	Chlorine	0.68	0.1	µg/L	$3,000
08/12/08	3rd Quarter 2008	Daily Max	Chlorine	0.16	0.1	µg/L	$3,000

A Doncasters Ltd company

Exhibit 2: Letter from Discharger to Regional Water Board in response to Settlement Offer No. R4-2010-0141-M. Note Section 1.0 contains residual chlorine effluent exceedances (Page 1 of 4).

JR 9/20/10

chlorine was not detected above the method detection limit. The analytical laboratory reports that report the correct value for residual chlorine is included as Attachment 1.

The chain-of-custody form submitted with each set of samples clearly identifies residual chlorine as the analyte of interest, yet the laboratory analyzed for, and reported, total chlorine. Due to the colorimetric analytical procedure used, the first color change, representing the residual chlorine fraction, is obscured by the second color change representing the total chlorine. Therefore, the laboratory's raw data cannot be reevaluated for residual chlorine.

It is our consultant's opinion, based on the available residual chlorine analytical data that the residual chlorine values were in fact below the permit discharge limit. The laboratory error resulted in the Board relying on inaccurate, erroneous sample data in the determination of the alleged violations.

Upon discovery of this error, discussions with the laboratory Director regarding this obvious laboratory QA/QC error were conducted. CAPI is in the process of selecting another certified laboratory for its future analytical needs.

2.0 Copper Citations

CAPI is contesting, and respectfully requests, that the Board dismiss and expunge the twenty-two alleged copper violations because the source of the copper was the City of Long Beach drinking water. The Board, in issuing the citations relied on data from an alternate source, the drinking water purveyed to the CAPI facility. A summary of the copper sample results is provided below:

Date	Monitoring Period	Violation Type	Parameter	Reported Value	Permit Limit	Units	Penalty
04/11/06	2nd Quarter 2006	Daily Max	Copper	190	20.8	µg/L	$3,000
04/30/06	2nd Quarter 2006	Monthly Max	Copper	190	10.4	µg/L	$3,000
10/26/06	4th Quarter 2006	Daily Max	Copper	25	20.8	µg/L	$3,000
10/31/06	4th Quarter 2006	Monthly Max	Copper	25	10.4	µg/L	$3,000
02/12/07	1st Quarter 2007	Daily Max	Copper	26	20.8	µg/L	$3,000
02/28/07	1st Quarter 2007	Monthly Max	Copper	26	10.4	µg/L	$3,000
05/15/07	2nd Quarter 2007	Daily Max	Copper	21	20.8	µg/L	$3,000
05/31/07	2nd Quarter 2007	Monthly Max	Copper	21	10.4	µg/L	$3,000
11/07/07	4th Quarter 2007	Daily Max	Copper	21	20.8	µg/L	$3,000
11/30/07	4th Quarter 2007	Monthly Max	Copper	21	10.4	µg/L	$3,000
05/07/08	2nd Quarter 2008	Daily Max	Copper	51	20.8	µg/L	$3,000
05/31/08	2nd Quarter 2008	Monthly Max	Copper	51	10.4	µg/L	$3,000
08/31/08	3rd Quarter 2008	Monthly Max	Copper	14	10.4	µg/L	$3,000
11/10/08	4th Quarter 2008	Daily Max	Copper	71	20.8	µg/L	$3,000
11/30/08	4th Quarter 2008	Monthly Max	Copper	71	10.4	µg/L	$3,000
03/04/09	1st Quarter 2009	Daily Max	Copper	32	20.8	µg/L	$3,000
03/31/09	1st Quarter 2009	Monthly Max	Copper	32	10.4	µg/L	$3,000
05/13/09	2nd Quarter 2009	Daily Max	Copper	31	20.8	µg/L	$3,000
05/31/09	2nd Quarter 2009	Monthly Max	Copper	31	10.4	µg/L	$3,000

Exhibit 2: Letter from the Discharger to Regional Water Board in response to Settlement Offer No. R4-2010-0141-M. Note Section 2.0 contains copper effluent exceedances (Page 2 of 4).

Date	Monitoring Period	Violation Type	Parameter	Reported Value	Permit Limit	Units	Penalty
08/31/09	3rd Quarter 2009	Monthly Max	Copper	11	10.4	µg/L	$3,000
11/19/09	4th Quarter 2009	Daily Max	Copper	190	20.8	µg/L	$3,000
11/30/09	4th Quarter 2009	Monthly Max	Copper	190	10.4	µg/L	$3,000

It is our belief that the City of Long Beach, the drinking water purveyor, was the source of the detected copper. A review of the available water quality reports from the City of Long Beach reveal that the 90th percentile copper concentration in the City drinking water was reported as 140 - 210 ug/L, for the reporting years addressed in the Notice. These concentrations are based on 150 to 156 sample points collected by the City during each testing year. Copies of the City records are included as Attachment 2.

These records clearly show that the City drinking water contains copper at concentrations well above the permit discharge limit. Each of the alleged 22 copper violations was at a concentration below or within the reported 90th percentile values for the City's source water. It is our consultant's opinion that the source of the excess copper concentrations is the City drinking water and not the CAPI cooling towers. The CAPI discharge was the equivalent of discharging tap water.

3.0 Lead Citations

CAPI contests, and respectfully requests, that the Board dismiss and expunge the three alleged lead violations on a factual basis. The Board, in issuing the citations relied upon unreliable data from corrupted, contaminated samples. A summary of the data is provided below:

Date	Monitoring Period	Violation Type	Parameter	Reported Value	Permit Limit	Units	Penalty
02/28/07	1st Quarter 2007	Monthly Average	Lead	8.2	4.4	µg/L	$3,000
05/07/08	2nd Quarter 2008	Daily Max	Lead	20	8.7	µg/L	$3,000
05/31/08	2nd Quarter 2008	Monthly Average	Lead	20	4.4	µg/L	$3,000

Of the 16 quarters of analytical data, lead has only been detected twice. A thorough review of all the products used in the cooling system showed that lead was not present in these products. These two anomalous data points indicate that a contaminant had been introduced into the sample, from contaminated glassware, during sample collection, sample handling, or during sample analysis.

4.0 2010 Discharge Reports

In conjunction with our detailed review of the 2006 – 2009 monitoring reports and data, CAPI also undertook an evaluation of its 2010 reports. CAPI is reporting to the Board the following apparent exceedences.

Exhibit 2: Letter from the Discharger to Regional Water Board in response to Settlement Offer No. R4-2010-0141-M. Note Section 3.0 contains lead effluent exceedances (Page 3 of 4).

Date	Monitoring Period	Violation Type	Parameter	Reported Value	Permit Limit	Units
02/18/10	1st Quarter 2010	Instantaneous Max	pH	9.3	8.5	pH units
02/18/10	1st Quarter 2010	Daily Max	Residual Chlorine	0.12	0.10	mg/L
02/18/10	1st Quarter 2010	Daily Max	Copper	100	20.8	µg/L
02/28/10	1st Quarter 2010	Monthly Max	Copper	100	10.4	µg/L
02/28/10	1st Quarter 2010	Monthly Max	Zinc	120	86	µg/L
05/19/10	2nd Quarter 2010	Instantaneous Max	pH	8.8	8.5	pH units
05/31/10	2nd Quarter 2010	Monthly Max	Copper	19	10.4	µg/L

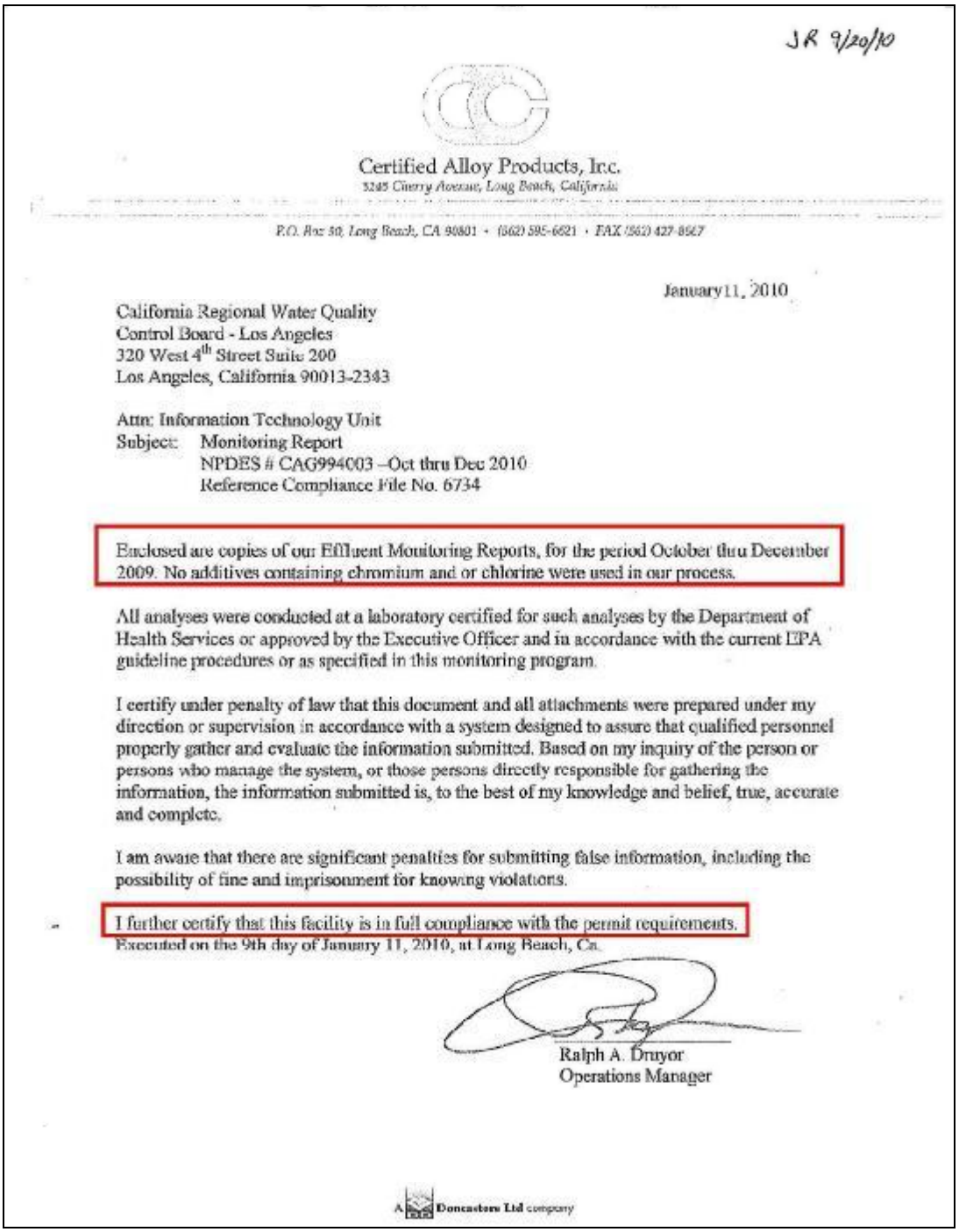
CAPI seeks to settle the above listed exceedences along with the non-contested exceedances listed in the notice of violation. As discussed above, it is our opinion that the 2010 residual chlorine and copper levels are not permit exceedances. That is, the reported chlorine level was total chlorine and not residual chlorine. Further, the copper levels were from the City drinking water.

5.0 Actions Taken In Response to the Notice

Upon receipt of the Boards' Expedited Notice, CAPI has taken numerous steps to address the cooling system discharge. The actions taken to date and those underway include the following:

a) Obtained the services of an environmental consultant, Winefield & Associates, LP, to evaluate the cooling system and process, and provide recommendations.
b) Reviewed 2006 – 2009 analytical reports for laboratory accuracy and appropriateness of analytical methods employed.
c) Reviewed 2010 discharge reports and analytical data.
d) Changed laboratories in response to QA/QC concerns that arose from the improper reporting of total chlorine.
e) Reviewed all Material Safety Data Sheets and met with our cooling tower chemical vendor to evaluate currently used products for the presence of materials cited in the Notice, and discussed potential alternatives for addressing the elevated pH.
f) Initiated the installation of a temporary system to collect and hold on-site, the cooling system discharge water. Installation was complete with the cooling water diverted to the holding tank as of Saturday August 28, 2010. The discharge water will be sampled and characterized prior to discharge in compliance with the NPDES permit or transported to an appropriate permitted offsite facility. The temporary batch processing system will remain until a permanent solution is in place.
g) Evaluated various permanent discharge treatment and diversion options.
h) Selected the permanent option of discharging to the Los Angeles County Sanitation District (LACSD) publically owned treatment works (POTW).
i) Initiated the process of preparing the LACSD Discharge Permit application.
j) Initiated modification of facility piping to connect to the LACSD sewer system.

Exhibit 2: Letter from the Discharger to Regional Water Board in response to Settlement Offer No. R4-2010-0141-M. Note Section 4.0 contains pH, residual chlorine, copper, and zinc effluent exceedances for February through May 2010 SMRs and Section 5.0 contains the Dischargers actions taken with regard to the above mentioned effluent exceedances (Page 4 of 4).



JR 9/20/10

Certified Alloy Products, Inc.
3345 Cherry Avenue, Long Beach, California

P.O. Box 50, Long Beach, CA 90801 • (562) 595-6821 • FAX (562) 427-8567

January 11, 2010

California Regional Water Quality
Control Board - Los Angeles
320 West 4th Street Suite 200
Los Angeles, California 90013-2343

Attn: Information Technology Unit
Subject: Monitoring Report
NPDES # CAG994003 –Oct thru Dec 2010
Reference Compliance File No. 6734

Enclosed are copies of our Effluent Monitoring Reports, for the period October thru December 2009. No additives containing chromium and or chlorine were used in our process.

All analyses were conducted at a laboratory certified for such analyses by the Department of Health Services or approved by the Executive Officer and in accordance with the current EPA guideline procedures or as specified in this monitoring program.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete.

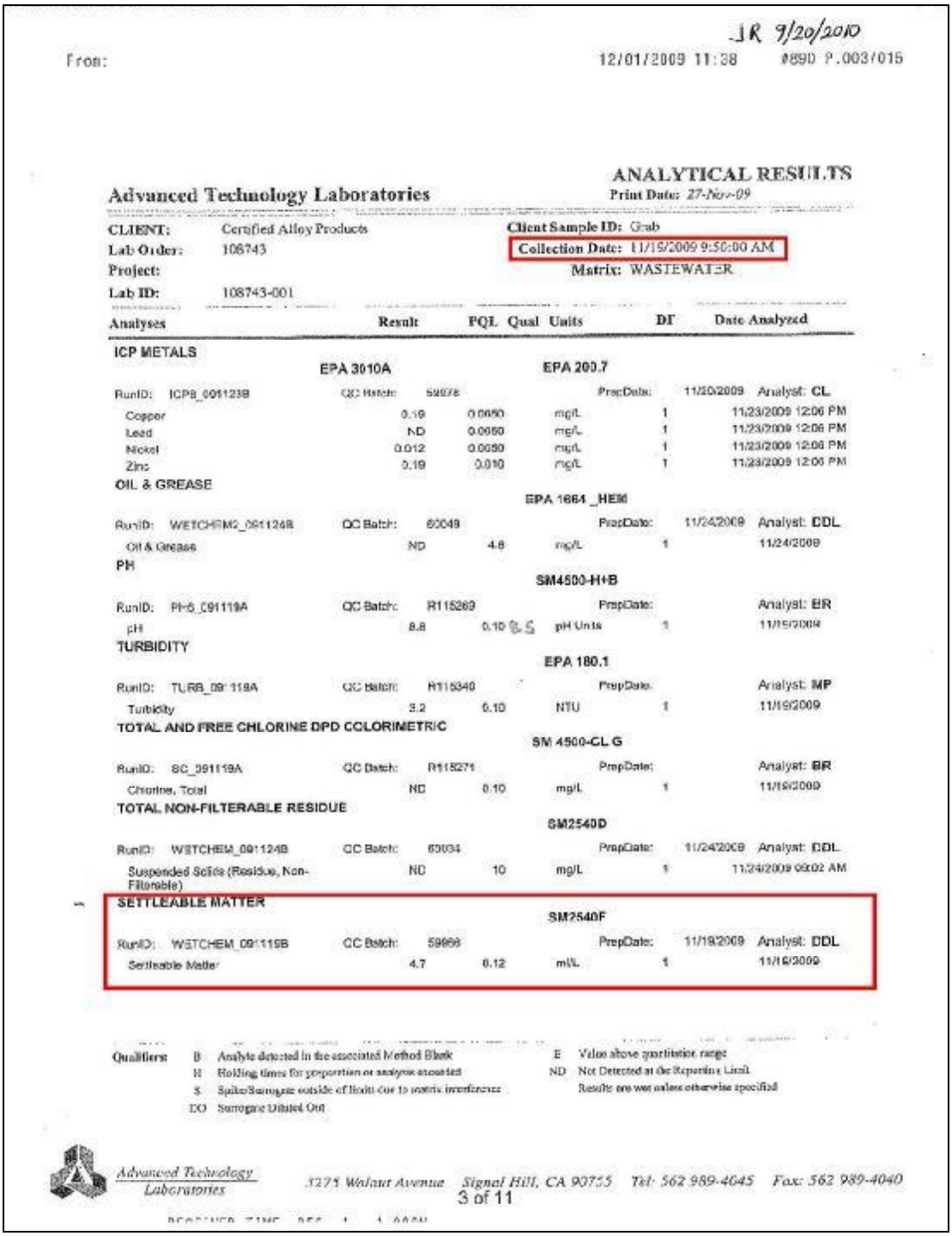
I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

I further certify that this facility is in full compliance with the permit requirements.
Executed on the 9th day of January 11, 2010, at Long Beach, Ca.

Ralph A. Druyor
Operations Manager

A Doncasters Ltd company

Exhibit 3: The Discharger's fourth quarter 2009 SMR cover letter. Note that the Discharger certifies that the Facility is in full compliance with permit requirements; however, Exhibit 2 (Page 3 of 4) indicates copper effluent exceedances on November 19 and 30, 2009 (Page 1 of 2).



JR 9/20/2010

From: 12/01/2009 11:38 #890 P.003/015

Advanced Technology Laboratories

ANALYTICAL RESULTS
Print Date: 27-Nov-09

CLIENT: Certified Alloy Products
Lab Order: 108743
Project:
Lab ID: 108743-001

Client Sample ID: Grab
Collection Date: 11/19/2009 9:50:00 AM
Matrix: WASTEWATER

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
ICP METALS						
EPA 3010A				EPA 200.7		
RunID: ICP8_091123B	QC Batch: 59878			PrepDate:	11/20/2009	Analyst: CL
Copper	0.19	0.0050		mg/L	1	11/23/2009 12:06 PM
Lead	ND	0.0050		mg/L	1	11/23/2009 12:06 PM
Nickel	0.012	0.0050		mg/L	1	11/23/2009 12:06 PM
Zinc	0.19	0.010		mg/L	1	11/23/2009 12:06 PM
OIL & GREASE						
				EPA 1664_HEM		
RunID: WETCHEM2_091124B	QC Batch: 60049			PrepDate:	11/24/2009	Analyst: DDL
Oil & Grease	ND	4.8		mg/L	1	11/24/2009
PH						
				SM4500-H+B		
RunID: PH-S_091119A	QC Batch: R115269			PrepDate:		Analyst: BR
pH	8.8	0.10	H,S	pH Units	1	11/19/2009
TURBIDITY						
				EPA 180.1		
RunID: TURB_091119A	QC Batch: R115340			PrepDate:		Analyst: MP
Turbidity	3.2	0.10		NTU	1	11/19/2009
TOTAL AND FREE CHLORINE DPD COLORIMETRIC						
				SM 4500-CL G		
RunID: SC_091119A	QC Batch: R115271			PrepDate:		Analyst: BR
Chlorine, Total	ND	0.10		mg/L	1	11/19/2009
TOTAL NON-FILTERABLE RESIDUE						
				SM2540D		
RunID: WETCHEM_091124B	QC Batch: 60034			PrepDate:	11/24/2009	Analyst: DDL
Suspended Solids (Residue, Non-Filterable)	ND	10		mg/L	1	11/24/2009 09:02 AM
SETTLEABLE MATTER						
				SM2540F		
RunID: WETCHEM_091119B	QC Batch: 59868			PrepDate:	11/19/2009	Analyst: DDL
Settleable Matter	4.7	0.12		ml/L	1	11/19/2009

Qualifiers:
B Analyte detected in the associated Method Blank
H Holding times for preparation or analysis exceeded
S Spike/Surrogate outside of limits due to matrix interference
DO Surrogate Diluted Out
E Value above quantitation range
ND Not Detected at the Reporting Limit
Results are wet unless otherwise specified

Advanced Technology Laboratories 3275 Walnut Avenue Signal Hill, CA 90755 Tel: 562 989-4045 Fax: 562 989-4040

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Exhibit 3: Discharger's contract laboratory report for grab samples collected on November 19, 2009. Note the settleable solids effluent exceedance result of 4.7 ml/L (effluent limit = 0.3 ml/L). The Discharger did not report this exceedance in the submitted SMRs shown above (Page 2 of 2).

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Certified Alloy Products, Inc.
3245 Cherry Avenue, Long Beach, California

September 1, 2010 P.O. Box 90, Long Beach, CA 90801 • (562) 555-6621 • FAX (552) 427-8667

Mr. Chris Lopez
Enforcement Unit
Expedited Payment Program
Los Angeles Regional Water Quality Control Board
320 West 4th Street, Suite 200
Los Angeles, California 90013

RE: RWQCB Settlement Offer No. R4-2010-0141-M: Offer to Participate in Expedited Payment Program Relating To Violations of the NPDES Permit for Certified Alloy Products, Inc., 3245 Cherry Avenue, Long Beach, CA

Order No. R4-2004-0058, NPDES Permit No. CAG994003, CI No. 674

Dear Mr. Lopez:

This letter was prepared and submitted on behalf of Certified Alloy Products, Inc. ("CAPI") in connection with the above-referenced notice of alleged violations identified by the State Water Resources Control Board's water quality data system ("the Notice"). The Notice provides an opportunity to participate in the Expedited Payment Program for Effluent and/or Reporting Violations. CAPI requests participation in the Expedited Payment Program, and as provided for in the program, this response is submitted to contest certain alleged violations as discussed in the following Sections.

1.0 Residual Chlorine Citations

CAPI contests, and respectfully requests, that the Regional Water Quality Control Board ("Board") dismiss and expunge the four alleged residual chlorine violations. The Board, in issuing the citations, relied on erroneous sample data due to incorrect analytical methods employed by the laboratory. These erroneous sample data are summarized below:

Date	Monitoring Period	Violation Type	Parameter	Reported Value	Permit Limit	Units	Penalty
09/12/07	3rd Quarter 2007	Daily Max	Chlorine	0.23	0.1	µg/L	$3,000
02/01/08	1st Quarter 2008	Daily Max	Chlorine	0.7	0.1	µg/L	$3,000
05/07/08	2nd Quarter 2008	Daily Max	Chlorine	0.68	0.1	µg/L	$3,000
08/12/08	3rd Quarter 2008	Daily Max	Chlorine	0.16	0.1	µg/L	$3,000

A Doncasters Ltd company

Exhibit 4: Discharger's response to Regional Water Board Settlement Offer No. R4-2010-0141-M. Note the Discharger's acknowledgement of "incorrect analytical methods" for residual chlorine monitoring (Page 1 of 4).

JR 9/20/10

chlorine was not detected above the method detection limit. The analytical laboratory reports that report the correct value for residual chlorine is included as Attachment 1.

The chain-of-custody form submitted with each set of samples clearly identifies residual chlorine as the analyte of interest, yet the laboratory analyzed for, and reported, total chlorine. Due to the colorimetric analytical procedure used, the first color change, representing the residual chlorine fraction, is obscured by the second color change representing the total chlorine. Therefore, the laboratory's raw data cannot be reevaluated for residual chlorine.

It is our consultant's opinion, based on the available residual chlorine analytical data that the residual chlorine values were in fact below the permit discharge limit. The laboratory error resulted in the Board relying on inaccurate, erroneous sample data in the determination of the alleged violations.

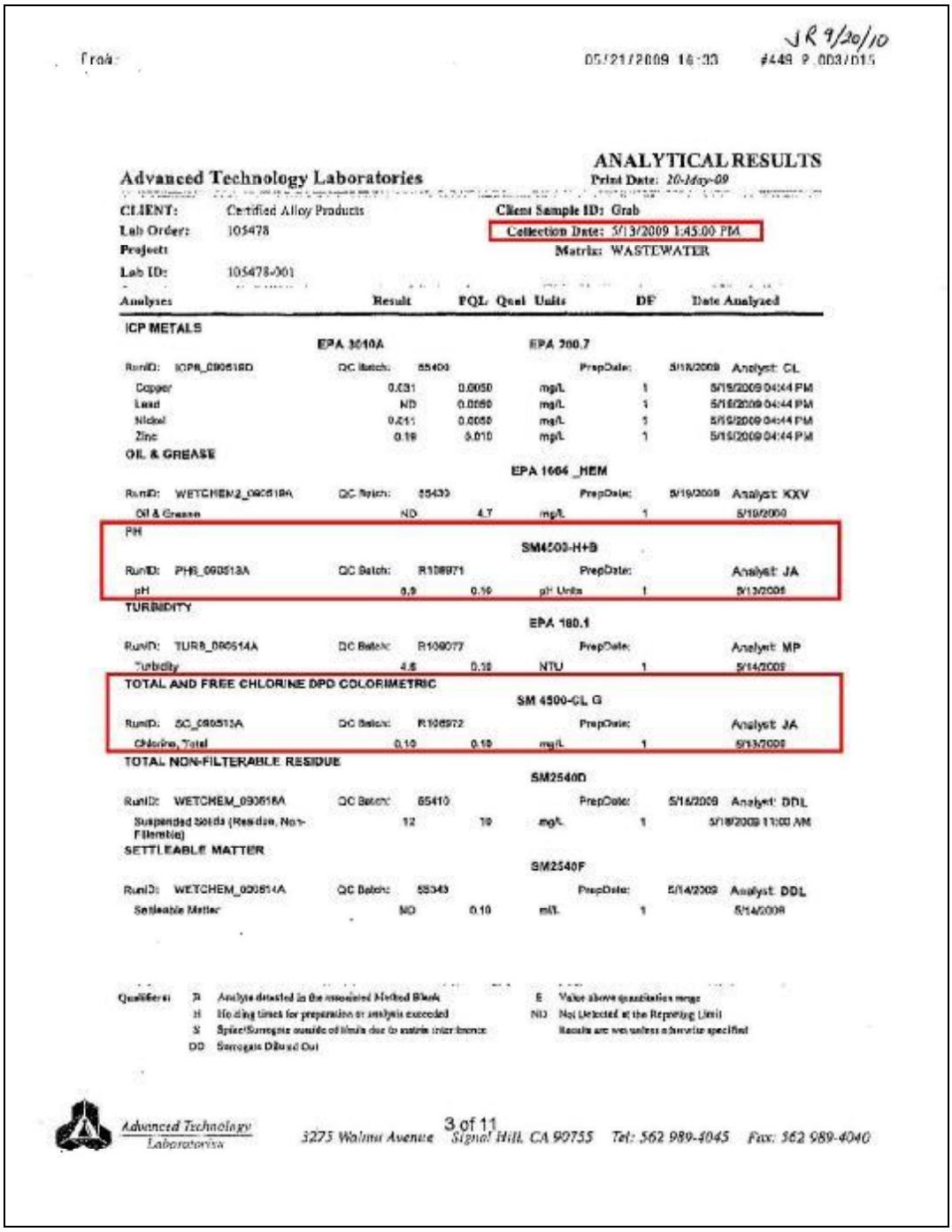
Upon discovery of this error, discussions with the laboratory Director regarding this obvious laboratory QA/QC error were conducted. CAPI is in the process of selecting another certified laboratory for its future analytical needs.

2.0 Copper Citations

CAPI is contesting, and respectfully requests, that the Board dismiss and expunge the twenty-two alleged copper violations because the source of the copper was the City of Long Beach drinking water. The Board, in issuing the citations relied on data from an alternate source, the drinking water purveyed to the CAPI facility. A summary of the copper sample results is provided below:

Date	Monitoring Period	Violation Type	Parameter	Reported Value	Permit Limit	Units	Penalty
04/11/06	2nd Quarter 2006	Daily Max	Copper	190	20.8	µg/L	$3,000
04/30/06	2nd Quarter 2006	Monthly Max	Copper	190	10.4	µg/L	$3,000
10/26/06	4th Quarter 2006	Daily Max	Copper	25	20.8	µg/L	$3,000
10/31/06	4th Quarter 2006	Monthly Max	Copper	25	10.4	µg/L	$3,000
02/12/07	1st Quarter 2007	Daily Max	Copper	26	20.8	µg/L	$3,000
02/28/07	1st Quarter 2007	Monthly Max	Copper	26	10.4	µg/L	$3,000
05/15/07	2nd Quarter 2007	Daily Max	Copper	21	20.8	µg/L	$3,000
05/31/07	2nd Quarter 2007	Monthly Max	Copper	21	10.4	µg/L	$3,000
11/07/07	4th Quarter 2007	Daily Max	Copper	21	20.8	µg/L	$3,000
11/30/07	4th Quarter 2007	Monthly Max	Copper	21	10.4	µg/L	$3,000
05/07/08	2nd Quarter 2008	Daily Max	Copper	51	20.8	µg/L	$3,000
05/31/08	2nd Quarter 2008	Monthly Max	Copper	51	10.4	µg/L	$3,000
08/31/08	3rd Quarter 2008	Monthly Max	Copper	14	10.4	µg/L	$3,000
11/10/08	4th Quarter 2008	Daily Max	Copper	71	20.8	µg/L	$3,000
11/30/08	4th Quarter 2008	Monthly Max	Copper	71	10.4	µg/L	$3,000
03/04/09	1st Quarter 2009	Daily Max	Copper	32	20.8	µg/L	$3,000
03/31/09	1st Quarter 2009	Monthly Max	Copper	32	10.4	µg/L	$3,000
05/13/09	2nd Quarter 2009	Daily Max	Copper	31	20.8	µg/L	$3,000
05/31/09	2nd Quarter 2009	Monthly Max	Copper	31	10.4	µg/L	$3,000

Exhibit 4: Page 2 of Discharger's response to Regional Water Board Settlement Offer No. R4-2010-0141-M. Note the Discharger's acknowledgement of "incorrect analytical methods" for residual chlorine monitoring (Page 2 of 4).



JR 9/20/10

From: 05/21/2009 16:33 #449 P.003/015

Advanced Technology Laboratories

ANALYTICAL RESULTS
Print Date: 20-May-09

CLIENT: Certified Alloy Products
Lab Order: 105478
Project:
Lab ID: 105478-001

Client Sample ID: Grab
Collection Date: 5/13/2009 1:45:00 PM
Matrix: WASTEWATER

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
ICP METALS						
EPA 3010A				EPA 200.7		
RunID: ICPR_090518D	QC Batch: 65400			PrepDate:	5/18/2009	Analyst: CL
Copper	0.031	0.0050		mg/L	1	5/18/2009 04:44 PM
Lead	ND	0.0050		mg/L	1	5/18/2009 04:44 PM
Nickel	0.011	0.0050		mg/L	1	5/18/2009 04:44 PM
Zinc	0.19	0.010		mg/L	1	5/18/2009 04:44 PM
OIL & GREASE						
				EPA 1664 _HEM		
RunID: WETCHEM2_090518A	QC Batch: 65433			PrepDate:	5/19/2009	Analyst: KXV
Oil & Grease	ND	4.7		mg/L	1	5/19/2009
PH						
				SM4500-H+B		
RunID: PHR_090513A	QC Batch: R108971			PrepDate:		Analyst: JA
pH	8.9	0.10		pH Units	1	5/13/2009
TURBIDITY						
				EPA 180.1		
RunID: TURB_090514A	QC Batch: R109077			PrepDate:		Analyst: MP
Turbidity	4.6	0.10		NTU	1	5/14/2009
TOTAL AND FREE CHLORINE DPD COLORIMETRIC						
				SM 4500-CL G		
RunID: SC_090513A	QC Batch: R108972			PrepDate:		Analyst: JA
Chlorine, Total	0.10	0.10		mg/L	1	5/13/2009
TOTAL NON-FILTERABLE RESIDUE						
				SM2540D		
RunID: WETCHEM_090518A	QC Batch: 65410			PrepDate:	5/18/2009	Analyst: DDL
Suspended Solids (Residue, Non-Filterable)	12	10		mg/L	1	5/18/2009 11:00 AM
SETTLEABLE MATTER						
				SM2540F		
RunID: WETCHEM_090514A	QC Batch: 65343			PrepDate:	5/14/2009	Analyst: DDL
Settleable Matter	ND	0.10		ml/L	1	5/14/2009

Qualifiers:
B Analyte detected in the associated Method Blank
H Holding times for preparation or analysis exceeded
S Spike/Surrogate outside of limits due to matrix interference
DO Surrogate Diluted Out
E Value above quantitation range
ND Not Detected at the Reporting Limit
Results are wet unless otherwise specified

Advanced Technology Laboratories
3275 Walnut Avenue Signal Hill, CA 90755 Tel: 562 989-4045 Fax: 562 989-4040

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Exhibit 4: Contract laboratory analytical results for chlorine sample obtained on May 13, 2009. Note the analytical method was 4500-CL G which is for total chlorine. The permit requires the Discharger to analyze for residual chlorine (method 4500-CL D). Furthermore, the analytical result for pH and chlorine does not indicate time of analysis; therefore, it was unclear to the inspector if the maximum allowable holding time for pH and residual chlorine had been met (Page 3 of 4).

Certified Alloy Products, Inc. (NPDES No. CAG994003) Exhibit Log
Inspected by: Jared Richardson (PG Environmental, LLC)

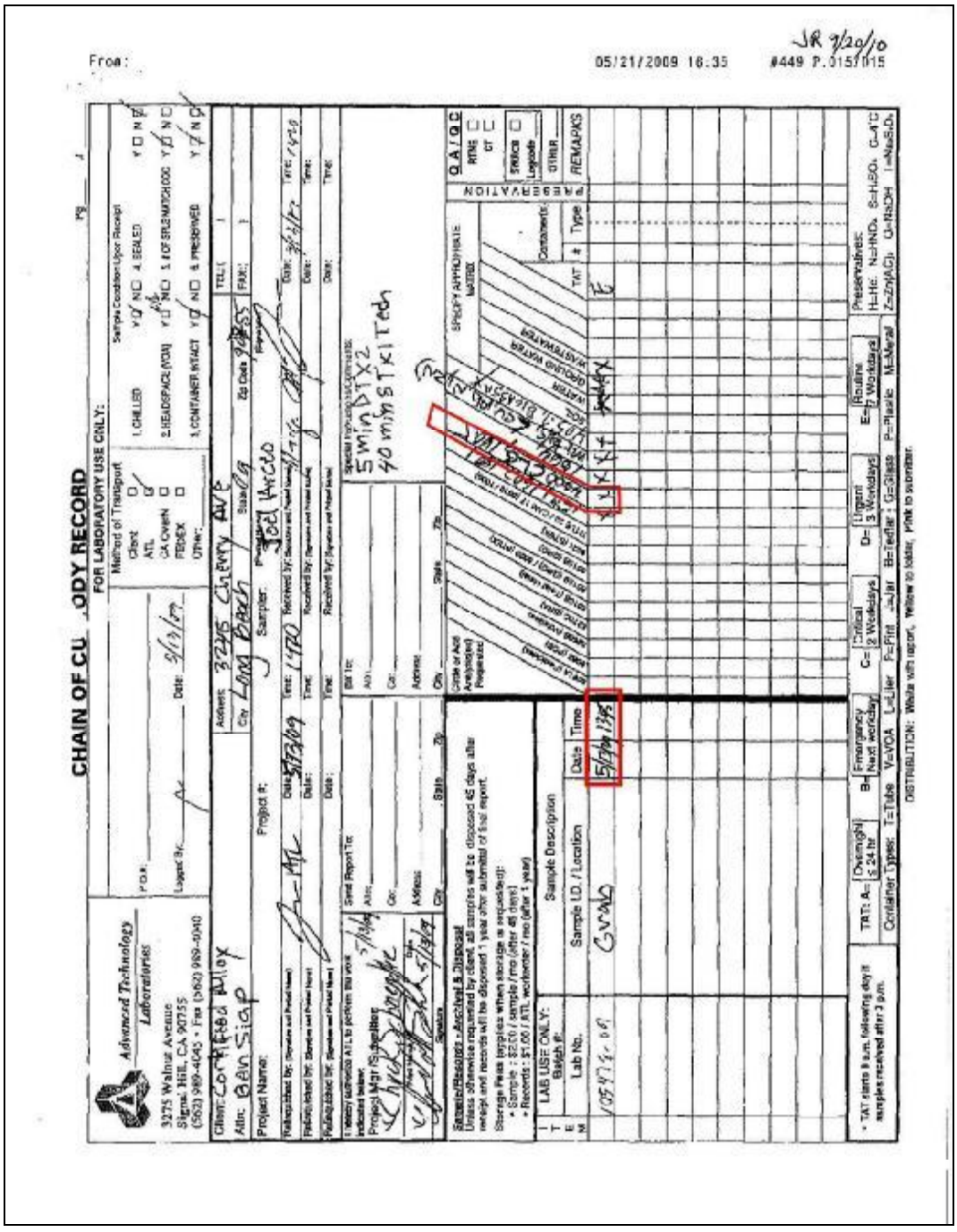
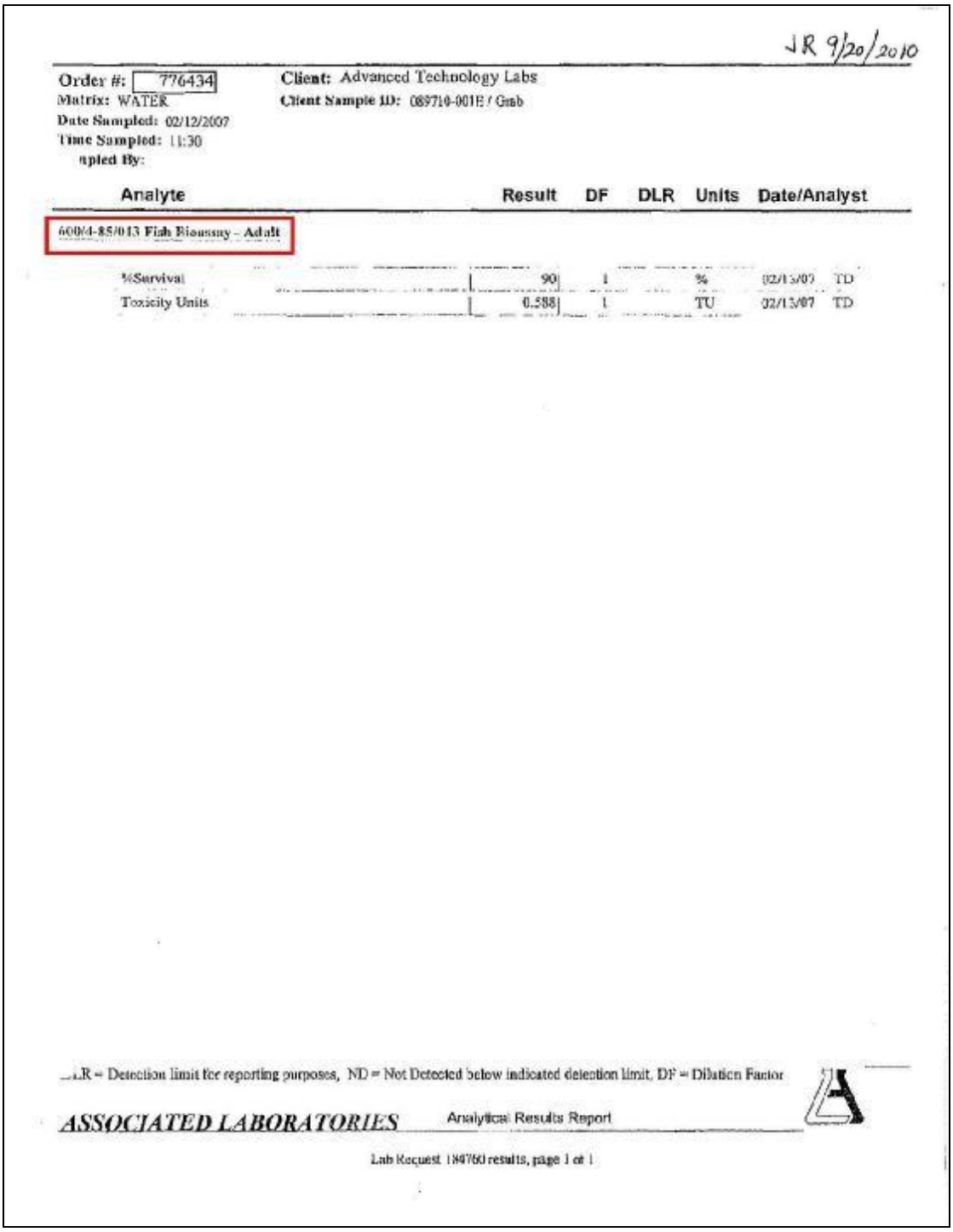


Exhibit 4: Chain-of-custody record for the May 13, 2009 sampling event also indicates the incorrect analytical method of 4500-CL G, which is for total chlorine rather than residual chlorine (4500-CL D). This is not consistent with the Discharger's statement that "The chain-of-custody form submitted with each set of samples clearly identifies residual chlorine as the analyte of interest" (refer to Exhibit 6 Page 2 of 4) (Page 4 of 4).



JR 9/20/2010

Order #: 776434
Matrix: WATER
Date Sampled: 02/12/2007
Time Sampled: 11:30
npled By:

Client: Advanced Technology Labs
Client Sample ID: 089710-001E / Grab

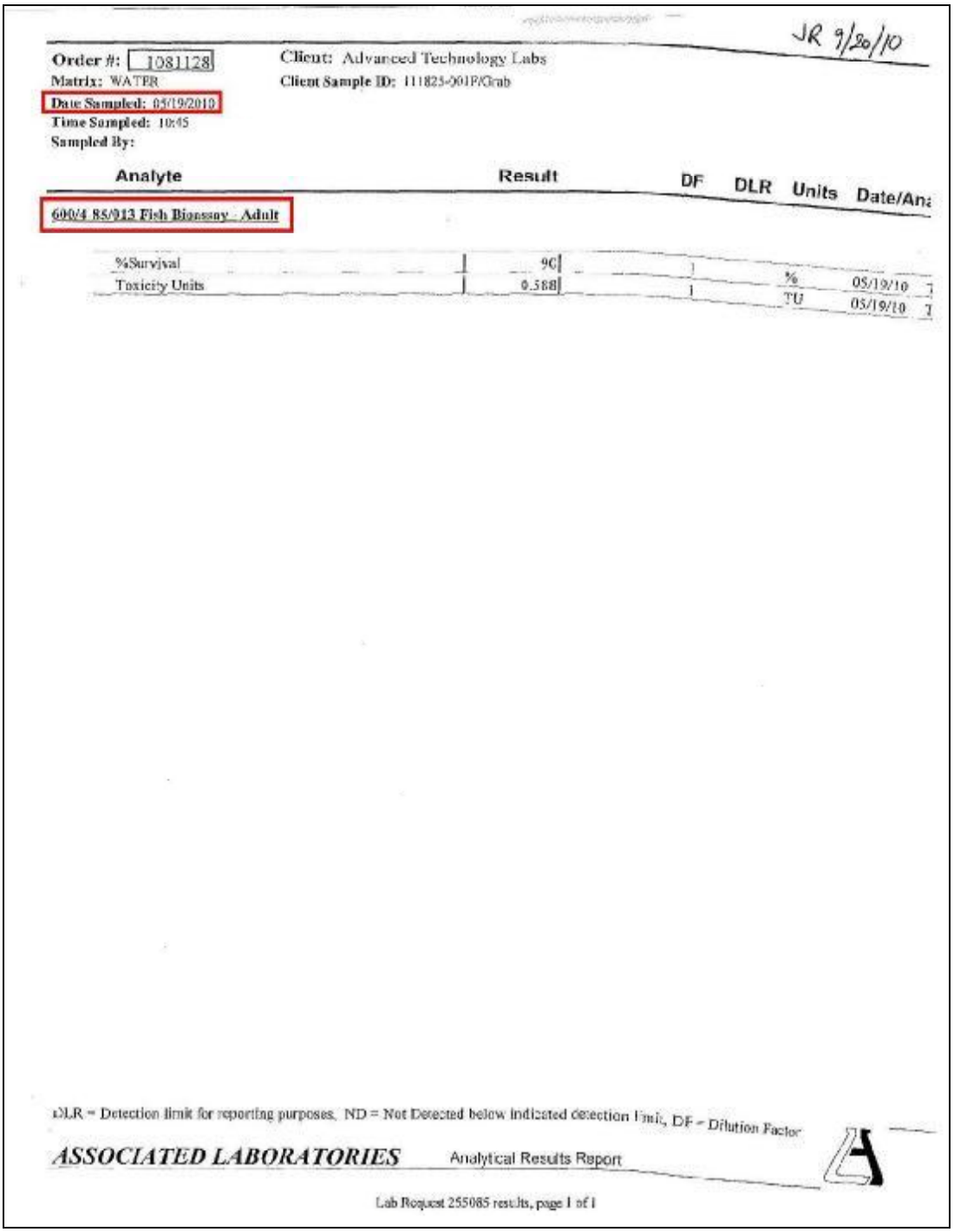
Analyte	Result	DF	DLR	Units	Date/Analyst
600/4-85/013 Fish Bioassay - Adult					
%Survival	90	1		%	02/13/07 TD
Toxicity Units	0.588	1		TU	02/13/07 TD

LR = Detection limit for reporting purposes, ND = Not Detected below indicated detection limit, DF = Dilution Factor

ASSOCIATED LABORATORIES Analytical Results Report

Lab Request 1847601 results, page 1 of 1

Exhibit 5: Discharger's contract laboratory analytical results for acute toxicity sample obtained on February 12, 2007. Note the incorrect analytical method of EPA/600/4-85-013 was used in place of the permit required method of EPA/821-R-02-014 (Page 1 of 2).



JR 9/20/10

Order #: 1081128
Matrix: WATER
Date Sampled: 05/19/2010
Time Sampled: 10:45
Sampled By:

Client: Advanced Technology Labs
Client Sample ID: 111825-001P/Grab

Analyte	Result	DF	DLR	Units	Date/Ana
600/4-85/013 Fish Biossay - Adult					
%Survival	90	1		%	05/19/10
Toxicity Units	0.588	1		TU	05/19/10

DLR = Detection limit for reporting purposes, ND = Not Detected below indicated detection limit, DF = Dilution Factor

ASSOCIATED LABORATORIES Analytical Results Report

Lab Request 255085 results, page 1 of 1

Exhibit 5: Discharger's contract laboratory analytical results for acute toxicity sample obtained on May 19, 2010. Note the incorrect analytical method of EPA/600/4-85-013 was used in place of the permit required method of EPA/821-R-02-014 (Page 2 of 2).